

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

JAMIE J. ISRAEL,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 5:23-CV-06074
	)	
MAYSVILLE R-1 SCHOOL DISTRICT	)	
BOARD OF EDUCATION, et al.,	)	
	)	
Defendant.	)	

PLAINTIFF’S MOTION FOR EXTENSION OF TIME TO FILE  
SUGGESTIONS IN OPPOSITION TO DEFENDANT HESLINGA’S MOTION  
TO DISMISS

COMES NOW the Plaintiff, Jamie J. Israel, by and through her attorney of record, Brian J. Klopfenstein, and hereby moves this Honorable Court for an extension of twenty-one (21) days from the time the Reply was due until July 28, 2023 to respond to the Motion to Dismiss. In support of the Motion for an Extension of Time, the Plaintiff suggests:

1. Counsel for Plaintiff believed the response was due on July 18, 2023 because he did not properly document the time that the motion was filed. Since the motion was filed, counsel has been involved in depositions in two different cases that were set for trial.
2. Additionally counsel for Plaintiff was involved in preparing for a contested hearing on a Motion to Modify to be tried in Jackson County, Missouri.
3. Finally, counsel for Plaintiff was out of the office celebrating his wife’s birthday and his wedding anniversary over the July 4<sup>th</sup> holiday weekend which caused Plaintiff to not return to the office until approximately July 10, 2023.

4. Counsel has corrected his calendar and will be working very hard to not make the same mistake again about not properly recording the response date.

5. Counsel, if given the opportunity will work to have a response filed before July 28, 2023.

6. Finally, counsel apologizes to the Court and opposing counsel for his mistake in recording the necessary due dates.

7. Counsel will suggest that no harm will occur by allowing him until July 28, 2023 to file the response to the Motion to Dismiss.

WHEREFORE, Plaintiff through Plaintiff's counsel prays this Honorable Court allow Plaintiff to file his response to the Motion to Dismiss Defendant Chris Heslinga by July 28, 2023.

Respectfully Submitted,

/s/ Brian J. Klopfenstein  
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ATTORNEY FOR PLAINTIFF

Certificate of Service

Plaintiff hereby certifies that she provided a copy to all parties in interest contemporaneously with the filing of this motion on July 18, 2023.

/s/ Brian J. Klopfenstein  
Attorney for Plaintiff